

----- Message from Jansson Patrik <Patrik.Jansson@asko.se> on Wed, 6 Apr 2011 12:10:47 +0000 -----

To: "mostefficient@energystar.gov"
<mostefficient@energystar.gov>

Subjectsv: ENERGY STAR Top Tier: Proposed Recognition
: Criteria

Hello.

I work with performance at Asko Appliances AB in Sweden and have some comments on the proposed criteria.

I am afraid that increasing the limit for "top tier" only make the manufacturers make one "special" program that fulfil the criteria. Based on the fact that there are no wash- or rinse efficiency criteria in the standard, makes it relatively easy to make a program that uses less energy and water. But it will not be a good wash program. The selected program shall be a "Program recommended for daily use", and if manufacturers make a special program that qualifies for "top tier" I personally wouldn't recommend that program for daily use. Of course it will use minimum energy and water, but the wash efficiency and rinse efficiency will be poor. Is Energy Star aware of this contradiction? I guess it is easier to tighten the limits on for example a TV or a refrigerator, but I am afraid that a increased limit for "top tier" on washers only will result in worse wash programs for the user.

Thank you for letting us submit our comments on proposed changes.

Best regards
Patrik Jansson